

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

TELCORDIA TECHNOLOGIES, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action No. 04-876-GMS
CISCO SYSTEMS, INC.,	)	
	)	
Defendant.	)	

**PLAINTIFF TELCORDIA TECHNOLOGIES, INC.'S  
OBJECTIONS TO DEFENDANT CISCO SYSTEMS, INC.'S  
NOTICE OF DEPOSITION OF RICHARD LAU**

Plaintiff Telcordia Technologies, Inc. ("Telcordia"), by its attorneys, hereby objects to Defendant Cisco Systems, Inc.'s ("Cisco") Notice of Deposition of Richard Lau.

**OBJECTIONS**

1. Telcordia objects to the time and location of the deposition. Telcordia will work with Cisco to schedule the deposition at a mutually agreeable time and place.
2. Telcordia objects to the use, including use by other parties, of any testimony from the noticed deposition in separate cases, such as the pending suits against Lucent and Alcatel (Telcordia Technologies, Inc. v. Lucent Technologies, Inc. Civil Action No. 04-875-GMS and Telcordia Technologies, Inc. v. Alcatel USA, Inc., Civil Action No. 04-874-GMS).
3. Telcordia objects to the extent that this deposition in combination with depositions of other witnesses would cause Cisco to exceed any of the limits on depositions set forth in the Federal Rules of Civil Procedure.

ASHBY & GEDDES

*/s/ Tiffany Geyer Lydon*

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Dated: March 24, 2006

167957.1

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of March, 2006, the attached **PLAINTIFF  
TELCORDIA TECHNOLOGIES, INC.'S OBJECTIONS TO DEFENDANT CISCO  
SYSTEMS, INC.'S NOTICE OF DEPOSITION OF RICHARD LAU** was served upon the  
below-named counsel of record at the address and in the manner indicated:

Jack B. Blumenfeld, Esquire  
Morris, Nichols, Arsht & Tunnell  
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HAND DELIVERY

Matthew D. Powers, Esquire  
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VIA ELECTRONIC MAIL

*/s/ Tiffany Geyer Lydon*

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Tiffany Geyer Lydon